

## MEMORANDUM

Date: July 24, 1997

To: Division of Shellfish Sanitation Staff

Through: Eric H Bartsch, PE, Director  
Office of Water Programs

From: Robert E. Croonenberghs, PhD, Director  
Division of Shellfish Sanitation

Subject: Shellfish Plants - Procedure - Information – Harvester's Tag

## PURPOSE

The objective of this protocol is to explain the NSSP harvester's tag requirements as they are to be followed in Virginia.

## INTRODUCTION

The National Shellfish Sanitation Program (NSSP) requires harvesters to place a tag with certain information on containerized product, or to fill out a transaction record for bulk product by the time it is sold to dealers. This requirement applies to all shellstock from both public and private grounds, except for product to be relayed. Currently the NSSP does not have a definition of "bulk", and FDA has agreed to allow the use of one harvester's tag or a transaction record for a day's catch of shellstock from one harvest area, whether or not it is containerized. Recent changes to the NSSP now require that when a dealer receives containerized product in bulk, *i.e.*, with only one tag or transaction record, that the dealer "shall have an intermediate processing plan approved by the Authority which establishes the procedures the dealer shall use to tag the lot during washing, packing or staging of shellstock."

## DISCUSSION

Under the NSSP certified dealers must obtain the harvester information at the time of purchase. The harvester has the option of either tagging each container of shellfish (*e.g.*, basket, bag or box), or of using one tag or transaction record for bulk (containerized or not) product from one harvest area. Under HACCP the dealer will probably have to keep representative harvester tags or the transaction records for his files.

The FDA Shellfish Specialist for our region has told us that harvest tags are not needed for product that is being relayed, because the Virginia Marine Resources Commission (VMRC) has control of the product throughout the relaying process, and thus there is no need to tag or develop

a transaction record.

If a harvester collects shellfish from more than one harvest area, then he will have to segregate the shellfish and submit a separate transaction record for each harvest area (or tag each container before leaving one harvest area and moving to another). The harvester can use either a harvester's tag as a transaction record, or he can record the required information on a separate piece of paper or form. The Division recommends transaction records be preprinted to be sure that all the required information is recorded. Photocopies of the sample harvester's tag below can be used as a transaction record (but not as a harvester's tag, because it would not be on waterproof material).

The VMRC, as a part of its Mandatory Reporting Program, requires harvesters to fill out a daily reporting form for clams but not oysters. This form can be used as a transaction record and the Division recommends its use as a transaction record for clams from public bottom, because it is preprinted and must be filled out by the harvester anyway.

The NSSP is quite specific about the construction and format of harvester's tags, whereas it says nothing about either of these concepts for transaction records. Requirements concerning harvester's tags versus transaction records are summarized below:

#### Harvester's Tags

- This tag, though similar to a Virginia certified dealer's tag, will not allow a harvester to sell his catch to the public. Uncertified harvesters can only sell shellfish to a certified dealer.
- If a certified dealer is the harvester, that dealer's tag can be used as the harvester's tag.
- Tags must be waterproof (e.g., Tyvek, plastic, etc., not heavy paper).
- The minimum size of the tag (2 5/8 by 5 1/4 inches), order of information and content information must be followed exactly (see example).
- A single harvester's tag can serve as a transaction record for bulk, loose catch and for containerized shellfish from one harvest area. When used in this manner, the tag must include the statement "All shellstock containers in this lot have the same harvest date and area of harvest" and the buyer's name.

#### Transaction Record

- The NSSP does not specify size of the record or an order of the information, and neither will DSS.
- Many types of records could be used, whether preprinted or not, though DSS recommends a preprinted form to be sure all information is captured.
- Photocopied forms on normal weight paper are acceptable, e.g., a photocopy of the following sample harvester's tag.
- VMRC's Daily Reporting Form is the preferred form to use for clams from public ground.
- A transaction record must contain the buyer's name in addition to all the information required for harvester's tags.
- A separate transaction record is required for each different harvest area.
- The transaction record shall be given to the purchaser of the shellfish at the time of sale.

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#### Harvester I.D. Number

The harvester I.D. number will be the last four digits of the VMRC license number (VMRC calls this the "final four").

#### Harvest Location

A key concept with the harvester's tag is that the harvest location recorded by the harvester is to be

the most specific location name as is practicable, **the name of the commingling area is not acceptable!**  
The VMRC/NOAA Virginia Water Area Codes represent areas that are too large and can no longer be used as harvest area names.

#### Commingling Area Names

Certified dealers at the primary purchasing level (*i.e.*, those that buy shellfish directly from the harvester) are the only people that can originate the use of a commingling area name, and they must keep records to show the harvest areas commingled in that shipment. If there is a problem with product from a commingling area, the dealer must be able to determine the specific harvest areas involved, rather than implicate the entire commingling area.

#### **Sample Harvester's Tag**

HARVESTER I.D. NUMBER: _____
DATE HARVESTED: _____
HARVEST LOCATION: _____
TYPE OF SHELLFISH: _____
QUANTITY OF SHELLFISH: _____
<b>THIS TAG IS REQUIRED TO BE ATTACHED UNTIL CONTAINER IS EMPTY OR IS RETAGGED AND THEREAFTER KEPT ON FILE FOR 90 DAYS.</b>
If this tag is used for bulk shellstock, all shellstock containers in this lot have the same harvest date and area of harvest.

\* A place may be provided where the dealer's name, address, and the certification number assigned by the Virginia Department of Health may be added, otherwise, the format of this tag must be followed exactly when made by the printing company.